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*The Trusted Integrator for Sustainable Solutions*

July 27, 2016

Ms. Denise Zeno, Task Monitor  
U.S. Environmental Protection Agency  
290 Broadway - 18th Floor  
New York, NY 10007-1866

**Document Control Nos.: W0358.1F.01029**

**Subject:       Abbreviated Preliminary Assessment Checklist**  
**PRIDCO Building Nos. T-1317-0-80 & T-1317-1-89**  
**TDD No.: 0004/1605-14**  
**Contract No.: EP-S8-13-01 (Region 8 START IV)**

Dear Ms. Zeno,

Weston Solutions, Inc. (WESTON®) is pleased to submit the Abbreviated Preliminary Assessment Checklist for the PRIDCO Building Nos. T-1317-0-80 & T-1317-1-89 site (EPA ID No. PRN000202720) located in Cayey, Puerto Rico. If you have any questions, please contact me at (732) 417-5814.

Very truly yours,

A handwritten signature in black ink that reads "Denise Breen". The signature is written in a cursive, flowing style.

WESTON SOLUTIONS, INC.  
Denise Breen  
Associate Project Scientist

enclosure

cc:     C. Romano, EPA (w/o enclosure)  
       M. Hauptman, EPA (w/o enclosure)  
       G. Gilliland, WESTON (w/o enclosure)  
       file

## ABBREVIATED PRELIMINARY ASSESSMENT CHECKLIST

This checklist can be used to help the site investigator determine if an Abbreviated Preliminary Assessment (APA) is warranted. This checklist should document the rationale for the decision on whether further steps in the site investigation process are required under CERCLA. Use additional sheets, if necessary.

**Checklist Preparer:** Denise Breen/Associate Project Scientist July 27, 2016  
 (Name/Title) (Date)  
205 Campus Drive, Edison, NJ 08837 (732) 417-5814  
 (Address) (Phone)  
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 (E-mail Address)

**Site Name:** PRIDCO Building Nos. T-1317-0-80 & T-1317-1-89

**Previous Names (if any):** Nypro Warehouse; Autoridad de Energia Electric Resc.; Vicks Products, Inc.; Micom Caribe

**Site Location:** Road 735  
 (Street)  
Cayey, Puerto Rico 07736  
 (City) (ST) (Zip)

**Latitude:** +18.127692° **Longitude:** -66.139736°

\* The site location coordinates were obtained from the EPA Superfund Enterprise Management System (SEMS).

### Describe the release (or potential release) and its probable nature:

In December 2008, analytical results for groundwater samples collected from water supply wells in Cayey by Region 2 Site Assessment Team 2 (SAT 2) indicated the presence of trichloroethylene (TCE) and bromodichloromethane at levels exceeding the Hazard Ranking System (HRS) Level 1 benchmarks and tetrachloroethylene (PCE) exceeding the sample quantitation limit. As part of the Cayey Site Discovery Initiative project in 2009, WESTON personnel observed Puerto Rico Industrial Development Company (PRIDCO) Building Nos. T-1317-0-80 & T-1317-1-89, located approximately 1.5 miles northeast from the contaminated well. The facility is subdivided into two portions of a single structure. Information provided by PRIDCO indicates that the buildings were constructed in 1980 and 1989. In 2009, the buildings were being used as a warehouse and distribution center by Nypro Healthcare, which produces injection molding for the pharmaceutical and electrical industries. PRIDCO file information obtained in 2009 indicated that the building was formerly operated by Autoridad de Energia Electrica in 1981, Vicks Products between 1976 and 1982, Micom Caribe between 1982 and 1985, and Nypro from 1985 to the present. Micom Caribe was a manufacturer of computer systems. There is an incomplete history and limited specific information on historical operations and the possible use of hazardous substances at the site. TCE and PCE have historically been used in industrial cleaning and degreasing processes and are common in computer systems manufacture and assembly, and it is possible that historical operations that were conducted at the subject property used these solvents. There are no previous analytical results to indicate whether or not there are any source areas or evidence of past environmental releases.

On June 17, 2016, WESTON personnel performed a site reconnaissance of PRIDCO Building Nos. T-1317-0-80 & T-1317-1-89. Currently the site is being rented from PRIDCO as an additional storage area for Becton Dickinson (BD). The company stores boxes and shipping equipment in the building; BD does not store any final or raw products here. A small garage is located in the northwest portion of the property for an unknown use. The site is mostly paved and is completely fenced. There are tractor trailer parking areas throughout the property and at the bay doors. There are a few pieces of abandoned debris at the site from the previous renters. According to a June 2016 PRIDCO file review of the property, the following companies have rented the property: Puerto Rico Electric Power Authority (from unknown to December 1981), Vicks Products, Inc. (from January 1982 to May 1982), Micom Caribe, Inc. (from July 1982 to May 1985), Nypro Puerto Rico, Inc. (from May 1985), and Olay, LLC (from 2013 to unknown). It is not clear when Olay, LLC ended their lease with PRIDCO and when BD started their lease for the property of concern. A July 2009 Phase 1 Environmental Site Assessment Report performed by Environmental Resources Management Puerto Rico, Inc. (ERM) stated that Nypro utilized the property for storage of finished goods and assembly of plastic health equipment components. According to the Phase I report, an open drain pipe was observed at the former chemical storage building that discharged directly

from the spill sump to the concrete perimeter storm water channel. Additionally, a 55-gallon drum containing hydraulic oil and various lead-acid batteries used for operation of fork lifts were identified on the property.

Based on the incomplete history of previous operations, the limited PRIDCO files and information, the historical industry and manufacturing conducted at the site that may have used hazardous substances including TCE or PCE, and the unknown historical housekeeping processes at the site, the PRIDCO Building Nos. T-1317-0-80 & T-1317-1-89 site is recommended for further assessment under CERCLA.

### Part 1 - Superfund Eligibility Evaluation

**If all answers are “no” go on to Part 2, otherwise proceed to Part 3.**

	YES	NO
1. Is the site currently in CERCLIS or an “alias” of another site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Is the site being addressed by some other remedial program (Federal, State, or Tribal)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3. Are the hazardous substances potentially released at the site regulated under a statutory exclusion (e.g., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or regulated by the NRC, UMTRCA, or OSHA)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
4. Are the hazardous substances potentially released at the site excluded by policy considerations (i.e., deferred to RCRA corrective action)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5. Is there sufficient documentation to demonstrate that no potential for a release that could cause adverse environmental or human health impacts exists (e.g., comprehensive remedial investigation equivalent data showing no release above ARARs, completed removal action, documentation showing that no hazardous substance releases have occurred, or an EPA approved risk assessment completed)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Please explain all “yes” answer(s).**

The CERCLIS ID is PRN000202720; the site is not currently on the National Priorities List (NPL).

### Part 2 - Initial Site Evaluation

For Part 2, if information is not available to make a “yes” or “no” response, further investigation may be needed. In these cases, determine whether an APA is appropriate. Exhibit 1 parallels the questions in Part 2. Use Exhibit 1 to make decisions in Part 3.

**If the answer is “no” to any of questions 1, 2, or 3, proceed directly to Part 3.**

	YES	NO
1. Does the site have a release or a potential to release?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2. Does the site have uncontained sources containing CERCLA-eligible substances?	Unknown – EPA plans to collect samples.	
3. Does the site have documented on-site, adjacent, or nearby targets?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If the answers to questions 1, 2, and 3 above were all “yes” then answer the questions below before proceeding to Part 3.

	YES	NO
4. Does documentation indicate that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
5. Is there an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
6. Is there an apparent release and no documented on-site targets or targets immediately adjacent to the site, but there are nearby targets (e.g., targets within 1 mile)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
7. Is there no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### EXHIBIT 1 SITE ASSESSMENT DECISION GUIDELINES FOR A SITE

Exhibit 1 identifies different types of site information and provides some possible recommendations for further site assessment activities based on that information. You will use Exhibit 1 in determining the need for further action at the site, based on the answers to the questions in Part 2. Please use your professional judgment when evaluating a site. Your judgment may be different from the general recommendations for a site given below.

Suspected/Documented Site Conditions		APA	Full PA	PA/SI	SI
1. There are no releases or potential to release.		Yes	No	No	No
2. No uncontained sources with CERCLA-eligible substances are present on site.		Yes	No	No	No
3. There are no on-site, adjacent, or nearby targets.		Yes	No	No	No
4. There is documentation indicating that a target (e.g., drinking water wells, drinking surface water intakes, etc.) has been exposed to a hazardous substance released from the site.	Option 1: APA →SI	Yes	No	No	Yes
	Option 2: N/A	N/A	N/A	N/A	N/A
5. There is an apparent release at the site with no documentation of exposed targets, but there are targets on site or immediately adjacent to the site.	Option 1: APA →SI	Yes	No	No	Yes
	Option 2: N/A	N/A	N/A	N/A	N/A
6. There is an apparent release and no documented on-site targets and no documented targets immediately adjacent to the site, but there are nearby targets. Nearby targets are those targets that are located within 1 mile of the site and have a relatively high likelihood of exposure to a hazardous substance migration from the site.		No	No	No	Yes
7. There is no indication of a hazardous substance release, and there are uncontained sources containing CERCLA hazardous substances, but there is a potential to release with targets present on site or in proximity to the site.		No	No	No	Yes

#### Part 3 - EPA Site Assessment Decision

When completing Part 3, use Part 2 and Exhibit 1 to select the appropriate decision. For example, if the answer to question 1 in Part 2 was “no,” then an APA may be performed and the “NFRAP” box below should be checked. Additionally, if the answer to question 4 in Part 2 is “yes,” then you have two options (as indicated in Exhibit 1): Option 1 --conduct an APA and check the “Lower Priority SI” or “Higher Priority SI” box below; or Option 2 -- proceed with a combined PA/SI assessment.

**Check the box that applies based on the conclusions of the APA:**

- |  |  |
|--|--|
| <input type="checkbox"/> NFRAP                         | <input type="checkbox"/> Refer to Removal Program - further site assessment needed |
| <input checked="" type="checkbox"/> Higher Priority SI | <input type="checkbox"/> Refer to Removal Program - NFRAP                          |
| <input type="checkbox"/> Lower Priority SI             | <input type="checkbox"/> Site is being addressed as part of another CERCLIS site   |
| <input type="checkbox"/> Defer to RCRA Subtitle C      | <input type="checkbox"/> Other: _____  |
| <input type="checkbox"/> Defer to NRC                  |  |

**Regional EPA Reviewer:**

\_\_\_\_\_  
Print Name/Signature

\_\_\_\_\_  
Date

**PLEASE EXPLAIN THE RATIONALE FOR YOUR DECISION:** The Higher Priority SI decision is based on a lack of sufficient analytical data to exclude the site as a source, the possibility of historical releases of CERCLA-eligible substances, possible historical use of PCE or TCE as degreasing solvents (as was common in electrical component manufacturing), and the close proximity to supply wells where contaminants have been detected.

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**APPENDIX A**  
**FIGURE**

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Sources: 1. Weston Solutions, Inc. Region 2 Site Assessment Team 2, Site Logbook, DCN: W0348.3B.00981, June 2016.  
 2. High Resolution Orthoimagery, United States Geological Survey (USGS). Publication Date: May 8, 2009. [https://ita.cr.usgs.gov/high\\_res\\_ortho](https://ita.cr.usgs.gov/high_res_ortho).

LEGEND:

- Building Footprint
- Property Boundary

SCALE:

1" = 100'

CLIENT NAME:

USEPA

TITLE:

Site Map  
 PRIDCO Building Nos. T-1317-0-80 & T-1317-1-89  
 Cayey, Puerto Rico



DATE:

July 2016

FIGURE #:

1

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**APPENDIX B**  
**PHOTO DOCUMENTATION**

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## Photographs

Contract No./WO Number	Site Name/Location	Date	Page
<b>EP-S8-13-01</b>	<b>PRIDCO Building Nos. T-1317-0-80 &amp; T-1317-1-89</b>	<b>6/16/2016</b>	<b>Page 1 of 2</b>
<b>Task No. 0358</b>	<b>Cayey, Puerto Rico</b>		



**Photograph 1** – View looking northwest at the entrance to warehouse located on the property. Exposed soil is located on the southern portion of the site.



**Photograph 2** – View of the western boundary of the site with limited access. A small shed with unknown purpose is located in the northwestern portion of the property.

## Photographs

Contract No./WO Number	Site Name/Location	Date	Page
<b>EP-S8-13-01</b>	<b>PRIDCO Building Nos. T-1317-0-80 &amp; T-1317-1-89</b>	<b>6/16/2016</b>	<b>Page 2 of 2</b>
<b>Task No. 0358</b>	<b>Cayey, Puerto Rico</b>		



**Photograph 3** – View of shipping supplies and equipment located inside the warehouse facility on the property.



**Photograph 4** – View of unlocked storage area with equipment/materials left from previous renters. Storage area is located on the eastern portion of the property.